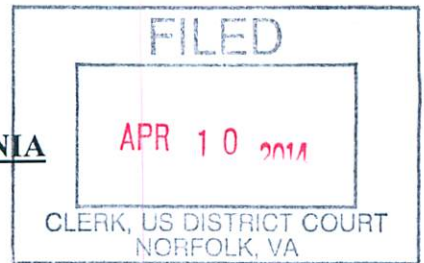


**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

UNDER SEAL



Case No.

2:14ms 142

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Stephen Logan, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the United States Naval Criminal Investigative Service (NCIS), and have been so employed since July 2008. I am currently assigned to the Little Creek Resident Agency Office, 1450 7th St, Joint Expeditionary Base Little Creek, Virginia Beach, VA, where I am assigned to investigate criminal matters. I have received training at the Federal Law Enforcement Training Center in Glynco, Georgia, and at the Naval Criminal Investigative Service Training Academy in Glynco, GA. In my capacity as a Special Agent, I have conducted investigations involving various forms of Family and Sexual Violence, including rape, sexual assault, child prostitution, child pornography and child sex abuse. Prior to my employment with the NCIS, I was a Military Policeman and Criminal Investigator in the United States Marine Corps Reserves with 11 years of experience. My law enforcement experience includes the preparation and execution of arrest and search warrants.

2. The information contained in this Affidavit is based on my personal knowledge, the review of documents, and observations made by me during the course of this investigation, as well as, information conveyed to me by other individuals, including information obtained from other law enforcement agencies.


SDC

3. Because this Affidavit is submitted for the limited purpose of establishing probable cause in support of the application for an arrest warrant, this Affidavit does not set forth each and every fact learned by me or observed by me during the course of this investigation.

4. This Affidavit includes only the facts I believe are necessary to establish probable cause to believe JEFFREY WRIGHT committed violations of 18 U.S.C. § 1591, Sex Trafficking of Children, 18 U.S.C. § 2423(a), Transportation of a Minor with the Intent to Engage in Criminal Sexual Activity, and 18 U.S.C. § 1519 Destruction, Alteration or Falsification of Records.

LEGAL AUTHORITY

5. 18 U.S.C. § 1591, in pertinent part, makes it a criminal offense to knowingly (1) in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, recruits, entices, harbors, transports, provides, obtains, or maintains by any means a person; or (2) benefit, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1), knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act.

6. 18 U.S.C. § 2423(a) makes it a criminal offense to knowingly transport an individual who has not attained the age of 18 years in interstate or foreign commerce with intent that the individual engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense.

7. 18 U.S.C. § 1519, in pertinent part, makes it a criminal offense to knowingly alter, destroy, mutilate, conceal, covers up, falsify, or make a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States, or in relation to or contemplation of any such matter or case.

BACKGROUND OF THE INVESTIGATION

8. On 03FEB14, NCIS received an anonymous tip via the NCIS Web tip service relating to violations of 18 U.S.C. § 1591 (Sex Trafficking of Minors) and 18 U.S.C. § 2423 (Transportation of Minors). The anonymous tipster alleged that Jane Doe is 17 years old (DOB 1996) and is being prostituted by Jeffrey Chadwick WRIGHT. Jane Doe is a runaway from Newport News, VA who last ran away from a foster home on 23NOV13. ~~WRIGHT is an active-duty Culinary Specialist in the United States Navy.~~ *WRIGHT was administratively separated from the US Navy on March 21, 2014. SDL*

9. A background check revealed Jane Doe was arrested in Alpharetta, GA on 20OCT13 for prostitution while working for a pimp, Cole Jamal DANIELS. Contact with FBI Special Agents in Atlanta revealed Jane Doe was again being advertised as an escort on the web page www.backpage.com, the same manner by which she originally was identified in Alpharetta, GA. The current advertisements were being paid for by a credit card issued to WRIGHT. DANIELS is pending trial in the United States District Court for the Northern District of Georgia for violations of 18 U.S.C. § 1591 (sex trafficking of minors). Jane Doe is one of the victims named in DANIELS' indictment.

10. FBI provided the telephone number (757) 207 0974 as the phone number JANE DOE was using in association with www.backpage.com advertisements in the Atlanta case. Jane

Doe's last www.backpage.com advertisement utilizing this cellular telephone number was 11JAN14 in Fredrick, MD.

11. There were photographs included in the backpage.com advertisements of Jane Doe.

12. On 05FEB14, after being advised of his rights under Article 31 of the UCMJ, NCIS Agents spoke with WRIGHT, during which time he provided two cellular telephone numbers as points of contact; (252) 207 0974 and (252) 213 0086.

13. A check of those phone numbers against the web page www.phoneescortsearch.com revealed the (252) 213 0086 phone number associated with Jane Doe's www.backpage.com advertisements on 27NOV13 and 30NOV13 in Norfolk, VA; on 20DEC13 in Virginia Beach, VA, and 22DEC13 in Raleigh, NC. WRIGHT is from Warrenton, NC, approximately fifty seven (57) miles from Raleigh, NC.

14. Additional checks of www.backpage.com utilizing several of Jane Doe's pseudonyms (Honey B, Pink China & Naomi C) revealed an additional phone number for WRIGHT as (252) 213 0089. The telephone number (252) 213 0089 is a cellular telephone number with service provided by U.S. Cellular. This number was associated with an advertisement on www.backpage.com on 23DEC13 in Virginia Beach, VA.

15. On 13FEB14, NCIS received an additional anonymous tip via their web service. This tip also included information relating to the threats made by DANIELS against Jane Doe. The tipster also reported Jane Doe contacted her mother on 12FEB14 from the phone number (252) 767 6621.

16. During the course of the investigation, Jane Doe's location was identified as Building U-20, Naval Station Norfolk, Norfolk, VA. On 04MAR14, a gray Lincoln LS, 4 door

Handwritten signature and initials, possibly "SDC", in the bottom right corner.

sedan bearing GA license plate PNE5723 was observed in the parking lot on 3rd Avenue and Bellinger Boulevard adjacent to Building U-20. On 04MAR14, Jane Doe and JEFFREY WRIGHT were located together in Room 242B, Building U-20. WRIGHT was arrested by Virginia Beach Police department for pandering and using a vehicle for prostitution and Jane Doe was also arrested.

17. Subsequent to being given his *Miranda* warnings, WRIGHT stated that he allowed Jane Doe to use his credit card to advertise for prostitution, he drove Jane Doe to various hotels and paid for the rooms where Jane Doe worked as a prostitute, and that he received the proceeds from the prostitution. In addition, subsequent to being given her *Miranda* warnings, Jane Doe confirmed this information.

18. Specifically, Jane Doe stated WRIGHT drove her from Virginia to Raleigh, NC (corresponding to the backpage.com advertisement) and she worked as a prostitute there, giving WRIGHT the money. Jane Doe stated she also worked as a prostitute in Virginia Beach, VA, and Norfolk, VA, giving WRIGHT all of the proceeds and that he paid for the hotel as well as transported her to and from the hotels.

19. Previous to these arrests, on 11DEC13, Jeffrey WRIGHT was stopped for a traffic violation in Gaithersburg, MD. WRIGHT was stopped in a dark colored Lincoln LS 4 door Sedan with GA license Plate PNE5723. Jane Doe stated that WRIGHT drove her to Maryland and she had posted an advertisement for prostitution services while there.

20. On 04MAR14, while Jane Doe was being transported from Norfolk Naval Station to NCIS Little Creek, she commented "I knew you all were following the Lincoln." When asked to clarify which Lincoln, Jane Doe responded "the one we were sitting beside in the parking lot." Jane Doe and law enforcement had previously been parked beside the dark colored Lincoln LS 4

door sedan bearing GA license plate PNE5723 (the "vehicle") in a parking lot on the corner of 3rd Ave and Bellinger Boulevard on Naval Station Norfolk.

21. A review of WRIGHT's subsequent jail calls to his mother, Valerie BURGESS, revealed letters written by Cole Jamal DANIELS to Jane Doe are located in the vehicle. WRIGHT asked BURGESS to enter the vehicle and remove the letters.

22. Your affiant also looked into the windows of the vehicle and observed a cellular phone.

23. WRIGHT has no permanent residence. He and Jane Doe had been living out of the vehicle or staying with friends whenever possible. WRIGHT's permanent Home of Record according to the Department of the Navy is in Warrenton, NC.

24. On 27MAR14, an attempt was made to execute a previously issued search warrant (issued by a federal magistrate judge of the Eastern District of Virginia and authorizing federal agents to search the vehicle for evidence of the prostitution scheme) on the vehicle but the vehicle had been removed from its previous location, despite the fact that Your Affiant had custody of the keys of the vehicle. Contact with C.M., who WRIGHT and Jane Doe were staying with at the time of WRIGHT's arrest, provided that the vehicle had been removed by BURGESS earlier that day.

25. R.T., the registered owner of the vehicle, is currently deployed at sea on board the USS HARRY S TRUMAN. R.T. reported she had provided power of attorney to WRIGHT for the vehicle. Subsequent to WRIGHT's arrest, R.T. was contacted by BURGESS who requested a power of attorney for the vehicle, which R.T. provided.



SDL

26. A review of the previously mentioned jail calls revealed BURGESS was aware of the presence of potential evidence relating to the crimes of sex trafficking of minors and interstate transport of minors.

27. On 27MAR14, C.M. conducted a consensually monitored phone call with BURGESS. During the course of the phone call, BURGESS stated she had taken the car back to North Carolina. Specifically BURGESS stated "the Lincoln is with me here in North Carolina".

28. A review of WRIGHT's jail calls with BURGESS on 27MAR14 revealed that BURGESS had made copies of letters provided to her by WRIGHT. BURGESS indicated to WRIGHT "the letters are in a very, very safe place and not in our home; and that's for anyone listening."

29. A review of the 27MAR14 Virginia Beach jail visitor log for WRIGHT revealed he was visited by BURGESS and James Bernard DURHAM.


30. A review of WRIGHT's jail calls with BURGESS on 29MAR14 revealed that an individual identified only by "JD" was in possession of the car. WRIGHT asked BURGESS "Is JD getting the car today?" BURGESS replied "JD has it now."

31. BURGESS' address is listed in Warrenton, NC. A background check for DURHAM revealed he had reported his address as in Warrenton, NC in OCT2013.

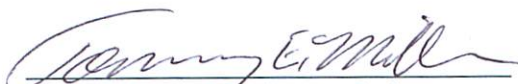
32. As of the date of this affidavit, law enforcement has been unable to locate the vehicle.

33. Based on the information and evidence set forth above, your affiant respectfully submits that there is probable cause to believe that JEFFREY WRIGHT has committed the following offenses: (a) from on or about November 27, 2013, to on or about January 11, 2014, in the Eastern District of Virginia and elsewhere, in or affecting interstate or foreign commerce,

JEFFREY WRIGHT recruited, enticed, harbored, transported, provided, obtained, or maintained by any means a person, namely Jane Doe who was 17 years old, or benefitted, financially or by receiving anything of value, from participation in a venture which has engaged in such act, knowing, or in reckless disregard of the fact, that the person, namely Jane Doe, has not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of 18 U.S.C. § 1591; (b) from on or about November 27, 2013, to on or about January 11, 2014, in the Eastern District of Virginia and elsewhere, JEFFREY WRIGHT did knowingly transport an individual, namely Jane Doe, who had not attained the age of 18 years in interstate and foreign commerce, with the intent that such individual engage in sexual activity for which any person can be charged with a criminal offense, in violation of 18 U.S.C. § 2423(a); and (c) on or about March 27, 2014, in the Eastern District of Virginia and elsewhere, JEFFREY WRIGHT did knowingly conceal and cover up, a document and tangible object with the intent to impede, obstruct, and influence the investigation involving the prostitution of children, a matter that JEFFREY WRIGHT knew or contemplated was within the jurisdiction of the Naval Criminal Investigative Service, a department and agency of the United States, and aided and abetted the same, in violation of 18 U.S.C. § 1519. Accordingly, I request that a warrant be issued authorizing the arrest of JEFFREY WRIGHT.


Stephen Logan
Special Agent
Naval Criminal Investigative Service

Sworn to before me this 10 day of April, 2014.


United States Magistrate Judge
Eastern District of Virginia